

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SOVEREIGN BANCORP, INC., et al.

Plaintiffs,

VS.

JOHN H. HARLAND COMPANY,

Defendant.

Civil Action No. 04-11631-EFH

JOINT MOTION FOR MODIFICATION OF CASE SCHEDULE

The parties attended a mediation before J. Owen Todd on December 13, 2004, and, as a result of the mediation, are pursuing settlement discussions. The parties plan to spend the next forty-five days attempting to negotiate a settlement, and believe that they will know by the end of this forty-five day period whether settlement is possible. In an effort to encourage settlement, the parties hereby jointly seek a forty-five day extension of all deadlines in this case.

This is the parties' first request for a modification of the case schedule.

WHEREFORE, the parties hereby move that the deadlines in the above-captioned matter be modified as follows:

A. Discovery Schedule

1. Close of Fact Discovery

Fact discovery shall be completed on or before June 1, 2005.

2. Expert Witnesses and Expert Discovery

Expert witnesses, if any, shall be identified in accordance with Fed.R.Civ.P. Rule 26 on or before July 15, 2005, and rebuttal experts, if any, shall be identified in accordance with

Fed.R.Civ.P. Rule 26 on or before August 15, 2005. Expert depositions shall be completed on or before September 15, 2005.

A. Motion Schedule

Motions for summary judgment and other dispositive motions shall be filed on or before November 1, 2005.

B. Pre-Trial Conference Date

The parties propose that the Court conduct a pre-trial conference in this matter on November 15, 2005, or as soon thereafter as the Court's calendar permits.

Respectfully submitted,

**PLAINTIFFS,
SOVEREIGN BANCORP, INC., et al.**

By their attorneys,

/s/ Paula S. Pliss

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